

**Kristi Cahoon Kelly**

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**From:** Len Bennett [lenbennett@cox.net]  
**Sent:** Friday, September 14, 2012 5:16 PM  
**To:** Ramana, Anand V.  
**Cc:** srotkin@clalegal.com; Kristi Cahoon Kelly  
**Subject:** Re: Adelina C. Rocabruna, et al. v. Bank of America, N.A., Civil Action No.: 1:12-cv-00506 (LMB/TCB)

Counsel - our deps are noticed. If you want alternate dates, please propose them.

Sent from my iPhone

On Sep 14, 2012, at 5:12 PM, "Ramana, Anand V." <ARamana@mcguirewoods.com> wrote:

Len, Kristi,

Enclosed please find our objections to the Rule 30(b)(6) notice you served on August 31. As you can see, we will not be offering a corporate witness for Topic Nos. 2, 11, 13, 16, 18, 24 or 25. In addition, we note that Topic Nos. 21, 22, and 33 are argumentative and based on false premises. Finally, we will provide the information responsive to Topic 23 in our written discovery responses. We do not believe that is an appropriate topic under Rule 30.

I anticipate that you will want a meet and confer teleconference. I am available on Monday or Wednesday of next week.

Kristi, please let me know when we can talk about finalizing deposition schedules.

Thanks,

Anand V. Ramana  
McGuireWoods LLP  
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Washington, DC 20006  
202.857.1734 (Direct Line)  
202.828.2973 (Direct Facsimile)  
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<Defendant Bank of America, N.A.'s Objections to Plaintiffs' Rule 30(b)(6) Notice.pdf>

